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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

HANSON DAI, et al.,

Plaintiffs,

v.

IDEAS, INC., et al.,

Defendants.

Lead Case No.: 4:24-cv-02537-JSW

**STIPULATED REQUEST FOR ORDER
CHANGING TIME (L.R. 6-2)**

Pursuant to Civil L.R. 6-2 and 7-12, defendants IDEaS, Inc., Four Seasons Hotels Limited, Hilton Domestic Operating Company Inc., Wyndham Hotels & Resorts, Inc., Hyatt Corporation, and Omni Hotels Management Corporation (collectively, “Defendants”) and plaintiffs Hanson Dai, Max Chiswick, Adolph Robles, Steven Stack, Matthew Gilbert, Michael Molinaro, Tony Qin, Mark Lester, Steven Shattuck, and Joel Kamisher (collectively, “Plaintiffs,” and together with Defendants, the “Parties”) respectfully stipulate as follows:

1. On July 18, 2025, the Court issued its Order Granting Motion to Dismiss with Leave to Amend and Setting Case Management Conference (ECF No. 137), which set the following deadlines:

| Case Event | Deadline |
|---|------------|
| Plaintiffs’ Amended Complaint | 08/25/2025 |
| Defendants’ Answer or Motion to Dismiss | 09/15/2025 |
| Case Management Conference Statement | 10/03/2025 |
| Case Management Conference | 10/10/2025 |

2. On August 4, 2025, the Court entered the Stipulated Revised Schedule and Order Thereon (ECF No. 139), which vacated the Case Management Conference scheduled for October 10, 2025 and associated deadlines.

3. Pursuant to Civil L.R. 7-3(a), Plaintiffs’ opposition to Defendants’ motion to dismiss is due 14 days after the filing of Defendants’ motion to dismiss, on September 29, 2025.

4. Pursuant to Civil L.R. 7-3(c), Defendants’ reply in support of their motion to dismiss is due seven days thereafter, on October 6, 2025.

5. The Parties have met and conferred and agree that a modest extension of these briefing deadlines would better allow them to present their arguments to the Court in connection with their opposition and reply briefs.

6. The Parties agree that, subject to the Court’s approval, Plaintiffs’ deadline to file their opposition brief shall be extended from September 29 to October 6, 2025, and Defendants’ deadline to file their reply brief shall be extended from October 6, 2025 to October 20, 2025.

NOW THEREFORE, the Parties request that the Court enter an Order setting Plaintiffs’ deadline to file their opposition to Defendants’ motion to dismiss on October 6, 2025, and Defendants’ deadline to file their reply in support of the motion to dismiss on October 20, 2025, and provide the Declaration of

1 Lauren Norris Donahue in support of this Stipulated Request.
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Dated: September 16, 2025

/s/ Timothy Z. LaComb

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*Attorneys for Defendant Omni Hotels Management
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FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I, Lauren Norris Donahue, hereby attest that concurrence in the filing of this document has been obtained from each of the above signatories.

Dated: September 16, 2025

By: /s/ Lauren Norris Donahue

PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

Dated: September __, 2025

HON. JEFFREY S. WHITE
United States District Judge